

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER
DISASTER SITE LITIGATION

21 MC 100 (AKH)

THIS DOCUMENT RELATES TO ALL
CASES

CERTIFICATION OF WENDELL Y. TONG

Wendell Y. Tong, an attorney duly admitted to practice law in the State of New York, being duly sworn, deposes and says as follows:

1. I am associated with the law firm of Sullivan Papain Block McGrath & Cannavo P.C., co-liaison counsel for six hundred and eighty nine (689) of the Plaintiffs herein, and as such am fully familiar with the facts and circumstances of the within action.

2. On October 13, 2010 and November 1, 2010, we moved the Court for orders compelling the United States Social Security Administration to comply with subpoenas served on behalf of certain of our client plaintiffs to produce “[r]ecords of decision regarding Social Security Disability Insurance and all supporting documents, including: medical records, narrative reports, affidavits, notices of award, claims forms, disability determination, transmittal forms and internal memoranda.”

3. On November 10, 2010, this Court granted the motions, and so-ordered the production of records.

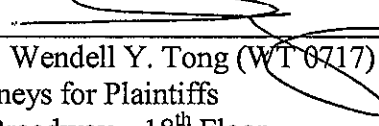
4. In response to the Court’s orders, the United States Social Security Administration has fully complied with the orders. Responses to the said subpoenas are complete.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
February 3, 2011

Respectfully submitted,

SULLIVAN PAPAIN BLOCK
MCGRATH & CANNAVO P.C.

By: 
Wendell Y. Tong (WT 0717)
Attorneys for Plaintiffs
120 Broadway – 18th Floor
New York, New York 10271
(212) 732-9000

STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

WENDELL Y. TONG, being duly sworn, deposes and says:

I am associated with the law firm of SULLIVAN PAPAIN BLOCK MCGRATH & CANNAVO P.C., attorneys for the Plaintiffs herein.

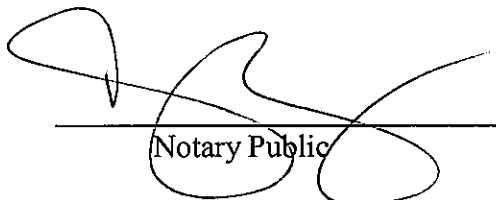
I have read the foregoing Certification and know the contents thereof, and upon information and belief deponent believes the matters alleged therein to be true.

The source of deponent's information and the grounds of her beliefs are communications, papers, reports, and investigations contained in the file.



WENDELL Y. TONG

Sworn to before me this
3rd day of February, 2011.



Notary Public

DENISE STRACUZZA
Commissioner Of Deeds, City Of New York
No. 4-6970
Cert. Filed In New York County
Commission Expires 3/11/2011